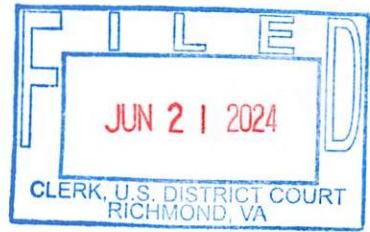


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION



UNITED STATES OF AMERICA

v.

BOYD FARM, LLC,

Defendant.

Case No. 3:24-cr-091

Knowing Discharge of Pollutants
33 U.S.C. § 1319(c)(2)(A)

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

Beginning in or around 2017, and continuing to in or around 2019, the exact dates being unknown, in the Eastern District of Virginia and within the jurisdiction of this Court, and within the navigable waters of the United States, defendant BOYD FARM, LLC knowingly discharged and caused the discharge of pollutants, specifically soil and fill material, from a point source, specifically excavation and earth moving equipment, into and within the waters of the United States, without having obtained a permit under the authority of the Clean Water Act.

(In violation of Title 33, United States Code, Section 1319(c)(2)(A).)

JESSICA D. ABER
UNITED STATES ATTORNEY

TODD KIM
ASSISTANT ATTORNEY GENERAL
ENVIRONMENT AND NATURAL
RESOURCES DIVISION
U.S. DEPARTMENT OF JUSTICE

By: *T.M.* for
Michael C. Moore
Assistant United States Attorney

T.M. for
Elise Kent Bernanke
Trial Attorney
Environmental Crimes Section